

**Hopkins, Ted**

**From:** Irwin, Barbara  
**Sent:** Tuesday, October 27, 1998 11:29 AM  
**To:** Hopkins, Ted  
**Cc:** Wiebe, Mark; Cathel, Bob  
**Subject:** State review of records

Ted, CDPHE, is going to review some training records, RCRA Inspections sheets and Tank Inventory Sheets today at 1:00, this is an advance review before the inspection that is scheduled for tomorrow at 8:00 (or 9:00) I won't be on Plant Site this afternoon so Mark Wiebe has agreed to be with the State while they review the "stuff". Shouldn't be any problems.

*Barbara*

**ADMIN RECCRD**

IA-A-000424

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## HIGHLIGHTED ENVIRONMENTAL ISSUES AND CONCERNS

10/12/98

- CDPHE conducted one two-day RCRA inspection in B371 last week. Two minor issues and one potential issue were identified:
  - one missing 1997 inspection logsheet for a permitted unit,
  - two containers with hazardous waste labels were not entered into WEMS,
  - three employees appear to lapse in RCRA training (potential issue, further investigation necessary to determine personnel job duties).

In general, CDPHE commented that they were very satisfied with the level of compliance in B371.

- No issues were identified during the B771 D&D tour last week.
- One inspection is scheduled for this week; the 980/968 laydown yards and review of activities at the Protected Area (PA) decon pad. The PA decon pad will be utilized for decontamination of RCRA contaminated debris and equipment. Decon activities will begin this week.
- No air inspections were conducted by CDPHE last week; CDPHE has completed their 1998 scheduled air inspections.
- As a result of the annual review of the Historical Release Report (HRR), KH EM&C is investigating an historical PCB release (prior to 1987 and the EPA PCB spill guidance) from Transformers 223-1 and 223-2. It appears that the corrective actions described in the HRR may have been insufficient and/or not implemented.
- The B374 corrective action to perform RCRA inspector training will begin in the next couple weeks. K-H will train-the-trainer, and the K-H Team subcontractors will take this training to floor level personnel within approximately 30 days. Training will focus on the *effective* use of inspection checklists, clarification of regulatory requirements and understanding of ownership/inspector responsibilities.
- Office equipment (furniture and supplies) appears to be showing up in places that have been vacated, such as the 980 and 968 pads. Appropriate controls and historical knowledge are not being maintained to ensure appropriate disposition of these materials.
- Negotiations are complete on the Decommissioning Program Plan (DPP) and DOE submitted it to CDPHE and USEPA for final concurrence and signature. Concurrence and signature by the Agencies is anticipated in late October.